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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

NAKIA V. PORTER, et al.,

Plaintiffs,

v.

COUNTY OF SOLANO, et al.,

Defendants.

Case No. 2:21-CV-01473-KJM-JDP

**STIPULATION AND ORDER TO MODIFY
THE PAGE LIMITS IMPOSED ON ALL
PARTIES' PLEADINGS RELATED TO
MOTIONS FOR SUMMARY JUDGMENT,
AND CROSS-MOTIONS FOR SUMMARY
JUDGMENT**

Hon. Kimberly J. Mueller
Chief United States District Judge

Plaintiffs Nakia Porter, on behalf of herself and her minor children, L.P. and A.P., Joe Berry
Powell, Jr., and Clifton Powell, on behalf of his minor child O.P., (collectively "Plaintiffs") by and
through their counsel of record, Yasin M. Almadani and Ahmed Ibrahim, Defendants County of Solano,
Solano County Sheriff's Office, Sheriff Thomas A. Ferrara, Dalton McCampbell, Lisa McDowell,
Connor Hamilton, and Chris Carter (collectively "County Defendants"), by and through their counsel of

1 record, Danielle K. Lewis, and Defendant Roy Stockton, by and through his counsel of record, Gregory
2 M. Fox, (collectively together “Defendants”) hereby stipulate to modify the page limits for all parties’
3 motion for summary judgment.

4 The parties hereby stipulate that:

5 1. The operative Complaint is Plaintiff’s Second Amended Complaint. (ECF No. 15)

6 2. The Second Amended Complaint consists of thirteen causes of action, 195 paragraphs,
7 spans 49 pages in length, and alleges causes of action against seven separate defendants. In addition,
8 there are five total Plaintiffs, which consist of two adults and three minors.

9 3. Plaintiffs intend to file a motion for summary judgment/adjudication. Both County
10 Defendants, as well as Defendant Roy Stockton, also intend to file separate motions for summary
11 judgment/adjudication. The parties have begun to meet and confer regarding the issues to be addressed
12 in the parties’ respective motions for summary judgment/adjudication.

13 4. County Defendants are represented by Danielle K. Lewis and Miles Maurino of Hawkins
14 Parnell & Young, LLP. Separately, Defendant Roy Stockton is represented by Greg Fox of Bertrand,
15 Fox, Elliot, Osman & Wenzel.

16 5. County Defendants and Defendant Roy Stockton intend to file separate motions for
17 summary judgment, based on the disparate allegations made against the County Defendants, and
18 Defendant Roy Stockton.

19 6. On February 22, 2024, the Court issued an Order modifying case deadlines, which dictated
20 that “All dispositive motions, except for motions for continuances, temporary restraining orders or other
21 emergency applications, shall be filed by July 15, 2024. Oppositions shall be filed by August 12, 2024,
22 and replies shall be filed by August 26, 2024.” (ECF No. 107)

23 7. The case is assigned to the Honorable Chief District Judge Kimberly Mueller, whose
24 standing order which states that the “Memorandum of Points and Authorities in support of or in
25 opposition to motions shall not exceed twenty pages. Replies shall not exceed ten (10) pages. Only in
26 rare instances and for good cause shown will the court grant an application to extend these page
27 limitations. All requests for page limit increases must be made in writing at least fourteen (14) days prior
28

1 to the filing of the motion.” (Hon. Judge Kimberly J. Mueller Civil Standing Order, Section 4(B))

2 8. Counsel for Plaintiffs and Defendants have met and conferred regarding a stipulation to
3 increase the page limits. Both parties agree that an increase to page limits of all memorandum of points
4 of authorities in support of a motion for summary judgment/adjudication, all oppositions, and all replies
5 warrant a modest increase to reflect the volume of allegations, causes of action, and parties.

6 9. Specifically, the parties hereby stipulate to increase the page limit to any memorandum of
7 points and authorities in support of a motion for summary judgment/adjudication from 20 pages to 30
8 pages.

9 10. The parties hereby stipulate to increase the page limit to any opposition to a motion for
10 summary judgment/adjudication from 20 pages to 30 pages.

11 11. The parties hereby stipulate to increase the page limits to any reply to an opposition to a
12 motion for summary judgment/adjudication from 10 pages to 15 pages.

13 12. This stipulation does not seek to modify any other case deadlines.

14 13. No trial date has been set.

15 14. This stipulation is being filed in good faith and not for purposes of delay.

16 15. The parties submit that the foregoing demonstrates good cause to grant the request in this
17 Stipulation.

18 **IT IS SO STIPULATED**

19
20 Dated: June 27, 2024

ALMADANI LAW

21 /s/ Yasin M. Almadani

22 Yasin M. Almadani, Esq.

23 Dated: June 27, 2024

AI LAW, PLC

24 /s/ Ahmed Ibrahim

25 Ahmed Ibrahim, Esq.

26 Attorneys for Plaintiffs

27 Dated: June 27, 2024

HAWKINS PARNELL & YOUNG

/s/ Danielle K. Lewis

Danielle K. Lewis, Esq.

Miles F. Maurino, Esq.

Attorneys for Defendants County of Solano, Solano
County Sheriff's Office, Sheriff Thomas A. Ferrara,
Dalton McCampbell, Lisa McDowell, Connor
Hamilton, and Chris Carter

Dated: June 27, 2024

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

/s/ Gregory M. Fox

Gregory M. Fox, Esq.

Attorneys for Defendant Roy Stockton

FILER'S ATTESTATION

I hereby attest that I have been authorized by counsel to show their signature on this document
as /s/.

DATED: June 27, 2024

/s/ Danielle K. Lewis

DANIELLE K. LEWIS

ORDER

The foregoing stipulation of the parties is approved, and IT IS SO ORDERED.

A memorandum of points and authorities in support of a motion for summary judgment/adjudication shall be 30 pages.

An opposition to a motion for summary judgment/adjudication shall be 30 pages.

A reply to an opposition to a motion for summary judgment/adjudication shall be 15 pages.

DATED: July 3, 2024.


CHIEF UNITED STATES DISTRICT JUDGE